Example of an ADJD Will

This is an anonymised example of an ADJD will. We always have the client's final ADJD will translated into Arabic. Abu Dhabi Judicial Department (ADJD) then notarises it.

Last Will and Testament of [Testatrix]

ONE: Declaration

I, [Testatrix], being of sound mind and memory and over the age of 18 years and not being actuated by duress, fraud, mistake or undue influence, do hereby make, publish and declare this to be my Last Will and Testament.

I revoke all earlier testamentary dispositions only to the extent that they relate to assets governed by this Will. All earlier testamentary dispositions relating to other assets remain unaffected.

TWO: Appointment of executors and trustees

a) I appoint my husband, [Husband], as executor and trustee of this Will if we are still married at my death.

b) If we are no longer married at my death, or if [Husband] does not survive me, is unable or unwilling to act, or ceases to act before the administration of my estate and any continuing administration under this Will have been completed, I appoint [Substitute Executor] to act in his place as executor and trustee of my Will.

THREE: Debts and funeral expenses

I direct my trustee to pay all my lawful debts, funeral expenses, and the costs of administering my estate, and to discharge the tax liabilities for which my estate is responsible in accordance with Article SIXTEEN.

FOUR: Letter of wishes

I direct my trustee to give due consideration to any letter of wishes signed and dated by me on or after the date of this Will. Such a letter may guide the exercise of a discretion conferred by this Will, but shall not amend or override this Will, change any beneficiary or beneficial entitlement, or change an age, payment condition or other binding provision. If letters of wishes are inconsistent, my trustee shall give preference to my most recent signed and dated wishes to the extent that they are consistent with this Will.

FIVE: Governing law and assets outside the United Arab Emirates

a) The law of the United Arab Emirates applies to the substantive provisions of this Will and the dispositions taking effect upon my death, in accordance with Article 17(3) of Federal Decree-Law No. 25 of 2025 Promulgating the Civil Transactions Law.

b) This Will governs all assets and interests belonging to me at my death and situated in the United Arab Emirates, together with the following specifically identified assets and interests situated or arising outside the United Arab Emirates:

i. United Kingdom: my [UK bank] current account, IBAN [IBAN withheld], including its balance and any accrued entitlement at the time of my death, and any account maintained with [UK bank] in the United Kingdom in continuation of or substitution for that account. This Will also governs all

my right, title and interest in [property address withheld], United Kingdom, to the extent that such interest forms part of my estate at my death and is capable of passing under this Will.

ii. United States of America: my interest in account number [account number withheld] held with [US brokerage firm], including my interest in all cash, securities, investments and other rights held in or through that account at my death, wherever those assets are situated, to the extent that such interest forms part of my estate and is capable of passing under this Will.

This description includes my interest in any replacement or renumbered brokerage account, including one with a different broker, to the extent that its assets can be traced to the account described above. If it also holds unrelated assets, those assets are covered only if they otherwise fall within this Will. The same rules on ownership and survivorship apply to the replacement account.

Any interest in either the original or a replacement account passing to a surviving joint account holder under a valid right of survivorship shall not be distributed under Article EIGHT. My trustee shall establish the effect of any divorce, severance or change in the account registration on that right under the applicable law and account terms. This exclusion from testamentary distribution shall not by itself exclude any value from my estate for tax purposes.

iii. My interest in my [provider withheld] crypto account and in any assets held through it at my death, wherever situated, to the extent that my interest forms part of my estate and can pass under this Will.

For each asset outside the United Arab Emirates, my executor shall establish what evidence of authority is required in the place of administration or registration and obtain any local grant, recognition or registration needed to collect or transfer that asset.

SIX: Religion & faith

I confirm that I am a non-Muslim.

SEVEN: Entitlements of insurance proceeds

Insurance proceeds payable directly to a beneficiary under a valid and effective beneficiary designation shall be paid in accordance with that designation, the policy terms and the applicable law. My trustee shall collect and distribute under Article EIGHT only those insurance proceeds which are payable to my estate, including proceeds payable to my estate because no beneficiary designation is effective at my death. This Article does not amend or revoke any valid beneficiary designation.

EIGHT: Distribution of my estate

My executor shall check the applicable employment law, scheme terms and any beneficiary or payment nomination before collecting employment benefits. Where the employer must pay a family member or other designated recipient, my executor shall distinguish the right to receive payment from the right to retain it. Insurance proceeds are dealt with under Article SEVEN.

I direct my trustee to make over the whole residue and remainder of my means and estate governed by this Will, including moveable and non-moveable property, bank accounts, savings, current and fixed deposits and any other accounts, motor cars, art and antiques, jewels and jewelry other than the pieces in which I am to be buried under Article TWELVE, furniture and fixtures, debentures, leasehold, bonds, security lockers, stocks, shares, investments, inheritances, mutual funds, capital, death in service benefits and gratuity payments to the extent that they form part of my estate, reserves, insurance proceeds payable to my estate in accordance with Article SEVEN, my interest in account number [account number withheld] held with [US brokerage firm], as described in Article

FIVE(b)(ii), my interest in the crypto account described in Article FIVE(b)(iii), any shareholding in any companies, my pets, subject to Article FIFTEEN, and any other assets governed by this Will, as follows:

a) One hundred percent (100%) to my husband [Husband] outright, if he survives me and we are still married at my death. The terms of my gift to [Daughter] below apply only if she inherits under paragraph (b). If [Husband] inherits under this paragraph and later dies, the property he inherited from me forms part of his own estate to the extent that he still owns it at his death, subject to any QDOT arrangement made under Article SIXTEEN(c)(v).

b) If [Husband] does not survive me, or if we are no longer married at the time of my death, I direct my trustee to make over the whole of my estate governed by this Will to our daughter [Daughter].

c) If [Daughter] becomes entitled under paragraph (b), my trustee shall make funds available from any part of her share remaining under administration for her tuition, board and general expenses while she attends university. This applies both to a course already in progress at my death and to a course begun subsequently, for as long as funds remain under administration for her under this Will.

My trustee shall take account of amounts already applied to the same board or general expenses from an allowance paid under paragraph (d), so that the same expense is not paid twice. Once her entire share has been transferred to her, this paragraph creates no further payment obligation for my estate. During her minority, her school education, maintenance and healthcare shall also be provided for under Article NINE.

d) If [Daughter] becomes entitled under paragraph (b) before reaching [specified age], my trustee shall retain and administer the Investment Fund forming part of her share until she reaches that age, subject to the payments and applications permitted by this Will. For the purposes of this paragraph, the Investment Fund comprises those assets in [Daughter]’s share that I held in an investment portfolio at my death, including cash held in the portfolio. This includes any portfolio assets that pass to her under Article FIVE(b)(ii). Cryptoassets and shares in a privately held company are included only to the extent that I held them as part of an investment portfolio. It includes their proceeds, replacement investments and accumulated income during administration.

The restriction until [specified age] applies to the Investment Fund. The rest of [Daughter]'s share shall be administered under Article NINE while she lacks full legal capacity and shall be transferred to her once she has full legal capacity and the relevant estate administration has been completed.

While [Daughter] is under [specified age], my trustee shall provide for her from the Investment Fund a monthly allowance equivalent to USD [monthly amount withheld], adjusted for inflation as provided below. The allowance shall commence as soon as she becomes entitled under paragraph (b), even if she is still a minor, and shall continue until she reaches [specified age], subject to the other provisions of this paragraph. The allowance is payable from her Investment Fund under this Will in addition to any allowance she receives from [Husband]’s estate. No amount payable from his estate shall be deducted from the allowance payable under this Will.

While [Daughter] lacks full legal capacity, my trustee shall set aside each monthly allowance as it falls due and keep a separate account of it for her. My trustee may use it to pay her expenses directly or, during her minority, through her lawfully acting financial guardian as provided in Article NINE(c). Any unspent allowance remains hers. Once she has full legal capacity, my trustee shall pay her the unspent balance and each subsequent allowance directly. If she dies first, the unspent balance passes to her estate.

Payments and applications for [Daughter] shall be made only from her own share and subject to the lawful debts, taxes and administration expenses attributable to that share. My trustee may realise assets where reasonably necessary to make a payment. If the funds properly available are

insufficient, the payment shall be limited to the amount properly available. No payment obligation shall continue after the funds from which it is payable have been exhausted. This limitation does not relieve my trustee from liability for any breach of duty.

Upon reaching [specified age], [Daughter] shall receive and control the whole remaining balance of the Investment Fund. If she becomes entitled under paragraph (b) on or after reaching that age, her whole share shall be transferred to her outright. In either case, Article NINE shall continue to apply if she lacks full legal capacity.

The retention of the Investment Fund is a provision for administration of [Daughter]'s share and does not substitute another beneficiary for her. If [Daughter] survives me and subsequently dies while any part of her share remains under administration, that remaining part shall form part of her own estate and shall be transferred to her duly authorised personal representatives.

The amount of USD [monthly amount withheld] is expressed in its purchasing power at the date of this Will. Before the first payment, and annually thereafter on each anniversary of the first payment, my trustee shall adjust the amount by comparing the most recently published Consumer Price Index for All Urban Consumers (CPI-U), U.S. city average, All items, immediately before the relevant adjustment with the most recently published index immediately before the date of this Will. If that index is discontinued or materially changed, my trustee shall use the most comparable successor index.

e) If paragraph (b) applies and [Daughter] does not survive me, her share shall pass to her descendants who survive me, by family branch. Her children shall take equal shares. The share of a child who has died before me leaving surviving descendants shall pass to those descendants in the same way, at each generation. A branch with no surviving descendant shall be left out when the shares are calculated.

f) If the circumstances described in paragraph (b) apply and [Daughter] does not survive me and leaves no descendant who survives me, I direct my trustee to make over the whole of my estate governed by this Will as follows:

i. [share withheld] to [Beneficiary A];

ii. [share withheld] to [Beneficiary B];

iii. [share withheld] to [Beneficiary C];

iv. [share withheld] to [Beneficiary D]; and

v. [share withheld] to [Beneficiary E].

g) If any beneficiary named in paragraph (f) does not survive me, that beneficiary’s share shall pass in equal shares to that beneficiary’s children who survive me. If any beneficiary named in paragraph (f) does not survive me and leaves no child who survives me, that beneficiary’s share shall be distributed among the other beneficiaries named in paragraph (f) who survive me or leave children who survive me, in proportion to their respective shares specified in paragraph (f). If any such other beneficiary does not survive me, the additional share allocated to that beneficiary shall pass in equal shares to that beneficiary’s children who survive me.

h) If no one takes under paragraphs (a) to (g), my executor shall distribute the residue to the persons entitled to it, in the shares prescribed by the intestacy law applicable to that property at my death.

NINE: Beneficiaries without full legal capacity

If any part of my estate is held for a beneficiary who lacks full legal capacity, my trustee shall have the following powers, subject to the specific provisions of Article EIGHT and, for [Daughter], Article FOURTEEN:

a) to pay or apply the whole or any part of the income or capital of that beneficiary's share for or towards that beneficiary's maintenance, education, healthcare, benefit and general welfare;

b) to retain, invest and reinvest that beneficiary's share;

c) during that beneficiary's minority, to pay to the beneficiary's lawfully acting financial guardian such amounts as are reasonably required for identified maintenance, education, healthcare or other welfare expenses, or to pay those expenses directly. These powers shall not be used to transfer the whole of [Daughter]'s Investment Fund to a financial guardian or to bring forward her right to receive or control it under Article EIGHT. The financial guardian shall account for the sums received, and any unspent balance shall remain subject to the administration and distribution provisions of this Will. A receipt acknowledges the payment but does not release my trustee from responsibility for the proper exercise of these powers; and

d) to hold and manage that beneficiary's share until that beneficiary has full legal capacity, subject to any specific provisions in this Will governing the age at which that beneficiary is entitled to receive or control any part of the estate.

TEN: Powers of executors and trustees

My trustee shall have the fullest powers as if the trustee were the absolute owner, but always for the benefit of the beneficiaries. This includes the power to retain, manage, invest, reinvest, realise, liquidate, transfer, distribute or otherwise deal with any part of my estate, including bank accounts, investment accounts, stocks and shares. These powers are subject to the distribution, payment and administration conditions in Articles EIGHT, NINE and FOURTEEN.

My trustee may appoint lawyers, accountants, tax advisers, investment advisers and other professionals where required for the administration of my estate and may pay their reasonable fees and expenses from my estate.

My trustee shall keep assets held for each beneficiary separately identified in the records and shall obtain any court orders, approvals, registrations and other formalities required under the applicable law to give legal effect to the continuing administration directed by this Will. If a direction cannot lawfully be implemented as written, my trustee shall seek directions from the competent court before making a distribution that would conflict with it.

Before transferring the Investment Fund to a trustee or custodian, my trustee shall identify the law governing its administration and establish whether that law permits the fund to be held until the age specified in Article EIGHT while preserving [Daughter]'s vested entitlement. Where more than one lawful arrangement is available, my trustee shall use one that gives effect to both directions. If mandatory law entitles her to demand the fund earlier, my trustee shall follow that law and seek directions from the competent court to resolve any dispute over payment.

ELEVEN: Organ donation

I consent to the medical removal of my organs once death has been declared in accordance with the applicable laws and medical protocols. I do not consent to the removal of either eye or any part of either eye, including the corneas.

I ask those arranging the donation to bring this exclusion to the attention of the medical team before any organs are removed. In the United Arab Emirates, my wishes are to be read together with any authenticated donor instructions I have recorded or subsequently record through the national organ donation system.

TWELVE: Funeral wishes

a) I wish to be buried in our family grave at the Roman Catholic cemetery known as ’t Hoog, on Kerkweg in Afferden, municipality of Druten, Gelderland, the Netherlands. If I die outside the Netherlands, I ask my executor to arrange for my body to be brought there for burial. Before the burial, I would like my memorial service to take place at the Mariakapel op ’t Hoog. I ask my executor to agree the arrangements, including the music, with the chapel and cemetery administrators.

b) I wish to wear my midnight-blue linen dress and my ivory cardigan, with my small gold hoop earrings and my silver bracelet with the blue enamel bird. I wish to be buried wearing both pieces of jewelry.

c) As people arrive, I would like them to hear “La Grange” by ZZ Top. During the service, please play “Rebel Rebel” by David Bowie, followed by a live performance of “Heb je even voor mij” on a Dutch barrel organ. As people leave, I would like “Highway to Hell” by AC/DC to be played. At the family grave, I would like to have “Waarheen, waarvoor” by Mieke Telkamp played.

d) After my burial in our family grave at ’t Hoog, I would like my invited guests to gather at De Meent, Koningsplein 24, Afferden for a Brabantse Koffietafel Luxe. I ask my executor to arrange the reception there. After the meal, I would like everyone to raise a glass to my life. Please serve at least six bitterballen per person with the drinks.

e) I would like each guest to take home a prayer card (bidprentje) as they leave after the toast at De Meent. For the card, please choose a photograph of me at thirty. That was the age when I felt I looked my best.

THIRTEEN: Guardianship

a) If, at the time of my death, our daughter [Daughter] is under the age of eighteen (18) years, I appoint her father, [Husband], to act as her permanent guardian.

b) If [Husband] does not survive me or dies after my death before our daughter [Daughter] reaches the age of eighteen (18) years, or lacks legal authority to care for her or is otherwise unable or unwilling to act as permanent guardian, I appoint [Beneficiary A] to act as substitute permanent guardian of our daughter [Daughter].

If [Beneficiary A] is unable or unwilling to act, or ceases to act while [Daughter] remains a minor and no parent is lawfully able to assume her care, my trustee shall promptly seek the appointment of a suitable permanent guardian by the competent court in [Daughter]'s best interests.

c) While [Daughter] is under the age of eighteen (18) years and no permanent guardian is able and available to take her into their care, I appoint the following persons as temporary guardians, in order of priority and subject to any required court approval:

i. [First Temporary Guardian];

ii. [Second Temporary Guardian]; and

iii. [Third Temporary Guardian].

d) The first person in the stated order who is able and willing to act shall serve as temporary guardian. The next person shall act only if the preceding person is unable or unwilling to act or ceases to act. Temporary guardianship shall end when [Daughter] is placed in the care of her lawfully acting permanent guardian or reaches the age of eighteen (18) years, whichever occurs first.

FOURTEEN: Financial guardian

a) If both [Husband] and I have died and our daughter [Daughter] is under the age of eighteen (18) years at the time the second of us dies, I appoint [Financial Guardian] to act as [Daughter]'s financial guardian.

This appointment shall also apply if [Daughter] becomes entitled under this Will while she is a minor and [Husband] is alive but lacks legal authority to act as her financial guardian, or has that authority but is unable or unwilling to act. The appointment shall be subject to any required court approval and shall not displace the powers of a living parent or guardian which cannot lawfully be displaced by this Will. If [Financial Guardian] cannot act or ceases to act, my trustee shall seek any necessary replacement appointment from the competent court. Pending that appointment, my trustee shall continue the administration required by this Will and, where lawfully permitted, pay [Daughter]'s expenses directly.

The provisions for administering [Daughter]'s inheritance in this Article apply only to property she receives under this Will. They do not give my trustee authority over property she later inherits from her father.

b) During [Daughter]'s minority, my trustee shall retain and administer any share held for her under this Will. The financial guardian shall manage only those funds or assets which my trustee transfers to the financial guardian for [Daughter]'s maintenance, education, healthcare, benefit or general welfare. The financial guardian shall have no authority over the balance retained and administered by my trustee. Transfers to the financial guardian shall be limited to the amounts and purposes permitted by Article NINE(c).

The financial guardian may retain, invest and reinvest the funds transferred by my trustee and may take all reasonable steps required to preserve and manage those funds, always in [Daughter]'s best interests and subject to the provisions of this Will.

The permanent guardian shall supervise the financial guardian's administration of the funds and assets transferred for [Daughter]. The financial guardian shall keep proper records and accounts of all funds received, payments made and assets managed on behalf of [Daughter] and shall provide the permanent guardian and my trustee with a written accounting at least once in each calendar year.

The financial guardian shall not be entitled to compensation for acting as financial guardian but may recover reasonable expenses properly incurred in carrying out these duties.

The powers of the financial guardian under this Article shall end when [Daughter] reaches the age of eighteen (18) years or dies, or when the financial guardian otherwise ceases to act. The financial guardian shall then provide a final account and deliver the related records to my trustee. If [Daughter] is alive, the financial guardian shall return all unspent funds and remaining assets derived from this Will to my trustee. If she has died, the financial guardian shall transfer those assets to the duly authorised personal representatives of her estate. My trustee shall continue to administer any Investment Fund which is to be retained until [specified age], and shall transfer the other assets to [Daughter] when she is entitled to receive them under Articles EIGHT and NINE. If [Daughter] has died, the transfer shall be made to the duly authorised personal representatives of her estate in accordance with Article EIGHT.

FIFTEEN: Pets

a) I give my two cats to [Pet Carer] if that person is willing and able to adopt them. The cats have always lived together, and I wish them to go to the same home.

b) I ask my trustee to give their carrier, bedding, veterinary records and any prescribed medication to the person taking them in.

c) If [Pet Carer] cannot adopt them, my trustee shall ask a local cat rescue organisation to find them a permanent home together. My trustee may arrange foster care for them while a home is being found.

d) My trustee may pay the reasonable costs of food, foster care and veterinary treatment from my estate until the cats have moved to their permanent home.

SIXTEEN: Tax provisions

a) General provisions

My trustee shall determine, as at the date of my death, my tax residence, domicile, citizenship and any other status relevant to taxation arising by reason of my death, and shall determine the legal nature, ownership and situs of each asset governed by this Will.

My trustee shall administer and distribute my estate in a manner which, to the fullest extent permitted by law, minimises inheritance tax, estate tax, tax arising from a deemed disposition on death and any comparable tax arising as a consequence of my death.

For this purpose, my trustee may determine the lawful timing, order and manner in which assets are retained, realised, transferred or distributed and shall claim all exemptions, deductions, allowances, nil-rate bands, credits, reduced rates, treaty benefits and other tax relief lawfully available to my estate or the beneficiaries.

The descriptions of legislation and treaties in this Article record the substance of the relevant rules in force at the date of this Will. They are included so that the purpose of these provisions remains clear even if the legislation is subsequently amended. At the time of my death, my trustee shall apply the legislation and treaties then in force, including any amendment, re-enactment, replacement legislation or replacement treaty, and shall take all lawful steps available under the law then in force to obtain the most favourable overall tax treatment.

Except for the QDOT arrangement expressly authorised by paragraph (c)(v) with [Husband]'s personal consent, nothing in this Article shall change the beneficiaries, their ultimate beneficial entitlements or any age, payment or other conditions imposed under Article EIGHT.

b) United Kingdom

i. My trustee shall apply the Inheritance Tax Act 1984, including sections 6 and 6A concerning the territorial scope of Inheritance Tax and long-term UK residence, section 18 concerning the spouse exemption, sections 267ZC and 267ZD concerning elections by spouses and sections 158 and 159 concerning relief from double taxation.

ii. At the date of this Will, an individual is generally a long-term UK resident for Inheritance Tax purposes if that individual has been UK resident for at least ten (10) of the twenty (20) tax years immediately preceding the tax year in which the relevant chargeable event, including death, occurs.

Where an individual has satisfied that test and subsequently becomes non-UK resident, that individual may continue to be treated as a long-term UK resident for a period of between three (3) and ten (10) consecutive tax years, depending on the number of years for which that individual was previously UK resident. After ten (10) consecutive tax years of non-UK residence, the previous UK residence history no longer causes that individual to remain a long-term UK resident under the present rules.

Before applying those rules, my trustee shall establish my UK domicile or deemed domicile status on 30 October 2024, whether I was non-UK resident in the 2025–26 tax year and whether I subsequently resumed UK residence. My trustee shall apply the transitional provisions where they

govern my status, including any shorter period for which overseas assets remain within the UK inheritance tax charge.

iii. If I am not a long-term UK resident at the time of my death, my trustee shall take into account that property situated outside the United Kingdom is generally outside the scope of United Kingdom Inheritance Tax, subject to the specific statutory exceptions then in force, while property situated in the United Kingdom may remain within its scope.

If I am a long-term UK resident at the time of my death, my trustee shall determine the extent to which property situated both within and outside the United Kingdom is within the scope of United Kingdom Inheritance Tax.

iv. If my husband, [Husband], survives me and is entitled to inherit under this Will, my trustee shall claim the spouse exemption under section 18 of the Inheritance Tax Act 1984 to the fullest extent permitted by law.

At the date of this Will, a transfer of property to a surviving spouse is generally exempt from United Kingdom Inheritance Tax. Where, immediately before the transfer, the person making the transfer is a long-term UK resident but the receiving spouse is not a long-term UK resident, section 18(2) restricts the exemption to an amount equal to the nil-rate band applying at the date of the transfer.

That restriction is cumulative. Any amount previously taken into account for the spouse or civil partner exemption in respect of an earlier transfer made by me to a spouse or civil partner reduces the restricted exemption subsequently available. Where the available exemption does not cover the whole transfer, my trustee shall apply the statutory allocation rules, including the order of priority and proportional allocation required by section 38(2) of the Inheritance Tax Act 1984 where it applies. In exercising any discretion left by those rules, my trustee shall take account of which assets bear the tax and any other relief available and shall choose the most favourable lawful Inheritance Tax treatment.

v. Sections 267ZC and 267ZD of the Inheritance Tax Act 1984 currently permit a spouse who is not a long-term UK resident, subject to the statutory conditions, to elect to be treated as a long-term UK resident for Inheritance Tax purposes.

Such an election may remove the restriction on the spouse exemption, but may also bring assets and transfers of the electing spouse situated outside the United Kingdom within the scope of United Kingdom Inheritance Tax.

At the date of this Will, a death election must normally be made within two (2) years after the relevant death, subject to a longer period allowed by HM Revenue & Customs. Once made, the election cannot be revoked and remains effective until the electing person has completed ten (10) successive tax years of non-UK residence.

My trustee shall therefore establish [Husband]'s residence history, assets and overall tax position and shall compare the tax saved as a result of the election with its present and future tax consequences for him. My trustee shall provide him with all information and assistance reasonably required to make the election where it is expected to produce the more favourable overall tax result. The election shall be made only by the person or personal representatives legally entitled to make it.

vi. If our daughter [Daughter] becomes entitled under Article EIGHT to property subject to United Kingdom Inheritance Tax, my trustee shall claim all exemptions, nil-rate bands, transferable nil-rate bands, deductions, credits and other relief available under the Inheritance Tax Act 1984.

My trustee shall also consider any residence nil-rate band available under the legislation then in force and shall claim it only where the property concerned and the circumstances of the inheritance satisfy the applicable statutory requirements.

c) United States of America

i. At the date of this Will, account number [account number withheld] is held with [US brokerage firm] in the United States of America. In relation to assets held through the brokerage account number [account number withheld], my trustee shall first determine whether, at the time of my death, I am a citizen or domiciliary of the United States of America for United States federal estate tax purposes.

If the account has been replaced, my trustee shall apply these instructions to the assets covered by Article FIVE(b)(ii), checking the actual registration, broker and account terms in force at my death.

At the date of this Will, a person is a nonresident not a citizen of the United States for federal estate tax purposes if that person is neither a United States citizen nor domiciled in the United States at death. Domicile for United States federal estate tax purposes is a separate concept from residence for United States income tax purposes.

If I am neither a United States citizen nor domiciliary at the time of my death, my trustee shall apply Chapter 11, Subchapter B of the Internal Revenue Code, including sections 2101 to 2108.

ii. At the date of this Will, section 2103 limits the United States gross estate of a nonresident who is not a United States citizen to the part of the gross estate situated in the United States.

Section 2104(a) provides that shares of stock owned and held by such a person are property situated in the United States:

"… only if issued by a domestic corporation."

Section 2105 treats certain property as situated outside the United States, including the proceeds of insurance on the life of a nonresident who is not a United States citizen and certain qualifying bank deposits and debt obligations.

My trustee shall identify each security and each other asset held through the brokerage account separately and determine its legal nature and situs for United States federal estate tax purposes.

The country in which the brokerage firm or a custodian is established, the place in which the account is administered and the currency in which an investment is denominated shall not by themselves determine the situs of the investment.

Where I hold shares or units in a fund, exchange-traded fund or other investment vehicle, my trustee shall determine the situs of the shares or units which I actually own and shall not determine their situs by reference to the underlying investments of that fund or investment vehicle unless the law or an applicable treaty requires that result.

iii. At the date of this Will, account number [account number withheld] held with [US brokerage firm] is registered in my name and the name of [Husband] as Joint Tenants with Rights of Survivorship. This account designation shall not be treated as establishing that only fifty percent (50%) of the value of the account or of any United States-situs asset held through it is included in my United States gross estate. The amount included shall be determined under the applicable United States federal estate tax rules set out below.

My trustee shall establish the legal form in which the account and each relevant asset are held, our respective beneficial interests and, where relevant, the source of the funds or other consideration used to acquire the relevant asset.

At the date of this Will, section 2040(a) of the Internal Revenue Code applies, among other things, to property held by the deceased and another person as joint tenants with right of survivorship, property held by spouses as tenants by the entirety, and certain bank deposits held in joint names and payable to either joint owner or the survivor.

Under section 2040(a), the value of such property is generally included in the deceased owner's gross estate except to the extent that the surviving joint owner can establish the part which originally belonged to that surviving owner and was not acquired from the deceased for less than adequate and full consideration. Where the surviving owner furnished part of the consideration used to acquire the property, the exclusion is generally proportionate to the consideration furnished by that surviving owner. Section 2040(a) also contains separate rules for certain property acquired jointly by gift, bequest, devise or inheritance.

My trustee shall obtain and retain the evidence reasonably required to establish the source of the funds used to acquire a jointly held asset and any other evidence relevant to determining the amount properly included in my United States gross estate.

Section 2040(b) currently provides a special fifty percent (50%) rule for a qualifying joint interest held by spouses. Section 2056(d)(1)(B), however, provides that this special rule does not apply where the surviving spouse is not a United States citizen.

My trustee shall therefore determine [Husband]'s United States citizenship status at the time of my death and shall not assume that fifty percent (50%) of any jointly registered asset is included in my United States gross estate.

If an asset is not held in a form to which section 2040 applies, my trustee shall determine the part, if any, included in my United States gross estate by reference to my actual legal and beneficial interest in that asset and the other provisions of the Internal Revenue Code then applicable.

iv. At the date of this Will, section 6018(a) of the Internal Revenue Code requires the executor of the estate of a nonresident who is not a United States citizen to file a United States federal estate tax return where the value of the United States-situs assets, together with the gift tax specific exemption and adjusted taxable gifts taken into account under that section, exceeds USD 60,000.

The USD 60,000 amount shall therefore not be treated as a test based solely on the value of assets held at death where earlier gifts or exemptions must also be taken into account.

At the date of this Will, the return is Form 706-NA, United States Estate (and Generation-Skipping Transfer) Tax Return – Estate of nonresident not a citizen of the United States, and the ordinary filing period is nine (9) months after death.

Section 2102 currently provides an ordinary maximum unified estate tax credit of USD 13,000 for the estate of a nonresident who is not a United States citizen, subject to the statutory rules and any more favourable credit available under an applicable treaty.

My trustee shall file the required return, claim the maximum credit and other relief lawfully available and obtain any transfer certificate, tax clearance or other document required for the release, administration or transfer of United States-situs assets.

v. If [Husband] survives me as my spouse and property passing to him is included in my United States gross estate, my trustee shall determine his United States citizenship status and apply sections 2056 and 2056A of the Internal Revenue Code to the extent relevant. Section 2106 applies only if, at my death, I am neither a United States citizen nor domiciled in the United States for federal estate tax purposes.

At the date of this Will, section 2056(d) generally denies the ordinary estate tax marital deduction where the surviving spouse is not a United States citizen. Property passing through a qualified domestic trust (QDOT) can qualify for the marital deduction where the statutory requirements are satisfied.

Section 2056A currently requires, among other matters, that at least one trustee of the QDOT is an individual United States citizen or a United States domestic corporation, that the required trustee has

the statutory right to withhold tax from distributions of capital, that the trust satisfies the requirements designed to secure collection of United States estate tax, and that the executor makes the prescribed QDOT election.

A QDOT generally defers rather than eliminates United States federal estate tax. Tax may arise on later distributions of capital and on the subsequent death of the surviving spouse.

My trustee shall compare the consequences of a QDOT with every treaty credit, marital credit, deduction or other relief available at the time of my death before deciding which treatment produces the more favourable overall tax result.

Where property would otherwise pass outright to [Husband] under Article EIGHT, my trustee may transfer or irrevocably assign it to a QDOT only if [Husband] personally consents while he has legal capacity to do so. If he consents and a QDOT produces the more favourable overall tax result, my trustee is authorised to take all steps permitted by law to establish or fund the QDOT and to make the required election, while preserving [Husband] as the intended beneficial recipient under Article EIGHT, subject to the restrictions required for the arrangement to qualify as a QDOT.

d) Canada

i. My nationality alone shall not be treated as establishing Canadian tax residence at the time of my death.

My trustee shall determine whether I am resident in Canada for tax purposes immediately before my death and whether any asset governed by this Will is otherwise subject to Canadian taxation arising by reason of my death.

ii. If I am resident in Canada immediately before my death, my trustee shall apply section 70 of the Income Tax Act of Canada.

At the date of this Will, subsection 70(5) generally treats a taxpayer who dies as having disposed of capital property immediately before death for proceeds equal to its fair market value immediately before death, subject to the exceptions and special rules contained in section 70.

iii. Subsection 70(6) currently provides a rollover for qualifying property transferred as a consequence of death to a spouse or common-law partner who was resident in Canada immediately before the taxpayer's death, or to a qualifying spouse or common-law partner trust satisfying the statutory requirements.

Under the present rules, the property must normally vest indefeasibly in the spouse or qualifying trust within thirty-six (36) months after death, although the Minister may allow a longer period following a timely application.

If [Husband] survives me, my trustee shall therefore establish his Canadian residence status before assuming that property passing to him qualifies for the rollover under subsection 70(6).

iv. Subsection 70(6.2) currently permits my legal representative to elect, in respect of a particular property, that the rollover under subsection 70(6) shall not apply and that the deemed-disposition rules shall instead apply.

My trustee shall compare, for each relevant asset, the overall Canadian tax consequences of applying the rollover with the consequences of electing out of the rollover and shall use the treatment producing the more favourable overall lawful tax result for my estate and the beneficiaries.

v. If I am not resident in Canada immediately before my death but Canadian tax nevertheless applies to an asset governed by this Will, my trustee shall determine and comply with the Canadian tax rules applicable to that asset under the legislation then in force.

e) Tax treaties and double taxation

i. At the date of this Will, the Convention between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the United Arab Emirates for the avoidance of double taxation and the prevention of tax evasion and avoidance with respect to taxes on income and on capital gains applies to taxes on income and capital gains and does not extend to United Kingdom Inheritance Tax.

My trustee shall not assume that this Convention provides relief from United Kingdom Inheritance Tax and shall establish whether, at the time of my death, it has been amended or replaced or another convention between the United Kingdom and the United Arab Emirates has entered into force which applies to a tax imposed by reason of death.

ii. At the date of this Will, the United Kingdom and the United States of America have a separate convention applying to estate and gift taxes. If United Kingdom Inheritance Tax and United States federal estate tax may apply to the same property, my trustee shall determine the taxing rights and relief available under that convention or any convention replacing it under the arrangements given effect by section 158 of the Inheritance Tax Act 1984. My trustee shall also consider any unilateral relief available under section 159 of that Act.

iii. My trustee shall consider Article XXIX B – Taxes Imposed by Reason of Death of the Convention between Canada and the United States of America with Respect to Taxes on Income and on Capital wherever its conditions may be satisfied.

At the date of this Will, Article XXIX B(2) provides a proportionate United States unified estate tax credit for the estate of an individual who was resident in Canada at death and was not a United States citizen. The credit is, subject to the conditions of the Article, the greater of the ordinary credit available to an estate of a nonresident who is not a United States citizen and a proportion of the credit available to an estate of a United States citizen, calculated by reference to the relationship between the United States-situs gross estate and the worldwide gross estate.

Article XXIX B(3) separately provides a non-refundable marital credit for qualifying property passing to a surviving spouse. Under the current Convention, the deceased must at the time of death be a United States citizen or a resident of Canada or the United States, and the surviving spouse must be resident in Canada or the United States. If both are residents of the United States, at least one must be a Canadian citizen. Claiming the marital credit requires the executor to elect the treaty benefit and irrevocably waive the benefits of any estate tax marital deduction otherwise available under United States law. The election and waiver must be made on the United States federal estate tax return filed for my estate by the deadline specified in Article XXIX B(3)(d) for making a QDOT election.

Where the marital credit is available, my trustee shall compare it with the consequences of a QDOT and any other United States marital relief and shall use the treatment producing the more favourable overall tax result.

Article XXIX B(5) currently provides that where an individual was resident in the United States immediately before death, both that individual and the individual's spouse are deemed to have been resident in Canada immediately before death for the purposes of subsections 70(5.2) and 70(6) of the Income Tax Act of Canada.

Article XXIX B(6) currently provides relief against Canadian tax for specified United States federal or state estate or inheritance taxes in the circumstances set out in that paragraph.

Article XXIX B(7) currently provides a United States estate tax credit for specified Canadian federal and provincial income taxes arising by reason of death in the circumstances set out in that paragraph.

Article XXIX B(8) currently limits United States estate taxation, subject to its conditions, where the deceased was resident in Canada, was not a United States citizen and had a worldwide gross estate not exceeding USD 1,200,000, or its Canadian-dollar equivalent.

My trustee shall consider each of these treaty provisions separately and shall not assume that qualification for one provision establishes qualification for another.

iv. If the same property is subject to taxation arising by reason of my death in more than one jurisdiction, my trustee shall apply any bilateral or multilateral treaty governing that taxation and shall claim the maximum relief lawfully available.

Where treaty relief does not fully eliminate the double taxation, my trustee shall also claim any unilateral credit, deduction or other domestic relief available. Where treaty relief and unilateral relief overlap, my trustee shall apply them in the combination and order producing the most favourable lawful result, without claiming double relief where the applicable law prohibits it.

f) Implementation

My trustee may obtain professional tax advice in the United Kingdom, the United States of America and Canada, and in any other jurisdiction in which tax is imposed by reason of my death or in relation to an asset governed by this Will or any continuing administration for a beneficiary, and may pay the reasonable costs of that advice from my estate.

My trustee may make all returns, filings, applications, claims and elections, obtain all valuations and evidence concerning ownership, beneficial ownership, source of funds or consideration, and take all other lawful steps required to administer and distribute my estate in accordance with this Article.

g) Tax liability and allocation

My trustee shall distinguish between the obligation to file a return or pay tax and the obligation ultimately to bear that tax. My trustee shall apply the applicable rules for allocation of tax and shall exercise any available rights to recover tax or obtain contributions from the persons or assets legally responsible for it, including where property passes outside the testamentary distribution under a right of survivorship or a beneficiary designation. Payment of tax by my trustee shall not, by itself, waive any right of recovery. My trustee shall keep separate records of such payments, allocations and recoveries and shall not delay a mandatory payment beyond its lawful deadline while seeking a contribution.

h) Tax during continuing administration

For as long as any part of my estate remains under administration for a beneficiary, my trustee shall determine the tax residence and legal classification of the relevant estate, trust or other administration arrangement, and any relevant tax status of the beneficiary and persons exercising control. My trustee shall reassess these matters following a relevant change of residence, trustee, guardian or control.

My trustee shall comply with the income tax, capital gains tax, trust tax and information-reporting requirements applicable to the retention, investment, transfer and distribution of those assets, and shall provide each beneficiary or lawful representative with the statements and information required for their own compliance. If my daughter is a U.S. citizen or a U.S. resident for federal income tax purposes, my trustee shall determine the U.S. tax consequences of any payment or benefit she receives, directly or indirectly, from a trust treated as foreign under U.S. tax law. My trustee shall give her the information she needs to complete Form 3520 if she is required to file it. The appointment of a person resident in the United States shall not, by itself, be treated as establishing the tax residence or classification of the arrangement.

Before selecting or changing an administration arrangement, my trustee shall consider its continuing tax and administration costs as well as any tax arising on my death, while preserving the beneficiary entitlements and conditions imposed by Article EIGHT.

Execution and attestation

This document is executed as follows:

Dated this .... day of .... [year].

I confirm that the information contained in this Will is true and accurate and that I am legally responsible for the information contained herein.

Name: [Testatrix]
Passport number: [withheld]
Signature: ....
Capacity: Testatrix

To be completed by the Court (Abu Dhabi Judicial Department)

Name of Attestation Officer: ....
Will Registration Number: ....
Signature: ....
Date: ....